



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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June 19, 1996

Ms. Debbie L. R. Austin
Forest Supervisor
Beaverhead-Deerlodge National Forest
420 Barrett Street
Dillon, Montana 59725

Re: Trail Creek Timber Sale Draft
Supplemental Environmental
Impact Statement

Dear Ms. Austin:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency, Region VIII, Montana Office (EPA) reviewed the above-referenced Draft Supplemental Environmental Impact Statement (DSEIS). A Trail Creek Final EIS (FEIS) had been prepared in 1990.

The Beaverhead-Deerlodge National Forest, Wisdom Ranger District, has prepared a draft Supplemental Environmental Impact Statement (DSEIS) in response to a December 29, 1994 U.S. District Court ruling that remanded the original 1990 Trail Creek FEIS for development and consideration of an alternative that preserves roadless areas within the Trail Creek area.

The DSEIS analyzes an alternative which does not enter any inventoried roadless area as directed by the U.S. District Court. The new alternative evaluated, Alternative H, is the preferred alternative. Alternative H was designed to comply with the Court ruling, and to address new information on a sensitive plant (*Allotropa virgata* - candystick), OHSA logging standards, timber cruise information, and cross country ski trails found within the project area. Alternative H proposes harvest in 31 units totalling 641 acres and results in approximately 4.9 MMBF of sawtimber. New road construction would total 3.2 miles (including 2.4 miles of temporary road to be obliterated after harvest).

We note that Trail Creek is designated as a Water Quality Limited Stream Segment (page IV-3). Stream segments with such designations need development of a Total Maximum Daily Load (TMDL). The TMDL process identifies the maximum load of a pollutant (e.g., sediment, nutrient, metal) a waterbody is able to assimilate and fully support its designated uses; allocates

portions of the maximum load to all sources; identifies the necessary controls that may be implemented voluntarily or through regulatory means; and describes a monitoring plan and associated corrective feedback loop to insure that uses are fully supported.

We recommend that the Forest Service contact the Water Quality Division of the Montana Department of Environmental Quality (i.e., Steve Tralles in Helena at 444-5316) to ensure that TMDL requirements for Trail Creek can be met.

We are pleased that Alternative H harvest units are located away from streams, and road designs avoid stream crossings to minimize sediment transport to streams. We agree that these designs are likely to result in minimal effects to fisheries and watershed values.

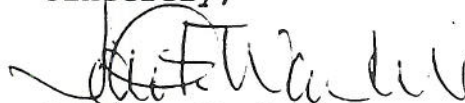
Mention is made of restoration activities undertaken in the past few years that will help improve sediment conditions in Trail Creek (page IV-3). We recommend that these restoration activities, and the monitoring activities that are proposed to measure and document the improved sediment conditions in Trail Creek, be described in the FSEIS.

We are pleased that no unit will be located within 100 feet slope distance from a stream or wetland. We recommend that the FSEIS include a description of the process that will be used to identify and delineate wetlands on the Forest to ensure that the location and boundaries of these valuable wetland areas are known, and thus, can be protected by the stipulation of no harvest in wetlands. We are also pleased that Alternative H does not propose any harvest of the 1,373 acres of old growth (page III-8 of 1990 FEIS and page IV-7 of DSEIS) stated to exist in the project area.

Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives in an EIS, the Trail Creek Timber Sale DSEIS has been rated as Category LO (Lack of Objections). The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal.

The EPA appreciates the opportunity to review and comment on the DSEIS. If you have any questions please contact Mr. Steve Potts of my staff in Helena at (406) 441-1140 ext. 232. Thank you for the opportunity to comment.

Sincerely,



John F. Wardell
Director
Montana Office

cc: Carol Campbell, EPA, 8EPR-EP, Denver
Ann Puffer, Forest Service-Region 1, EAP, Missoula
Steve Tralles, MDEQ-WQD, Helena